

EXHIBIT R

In the Matter Of:

IN RE PORK ANTITRUST LITIGATION

JENNIFER SULLIVAN

April 15, 2022



Page 1			Page 3		
1 UNITED STATES DISTRICT COURT 2 DISTRICT OF MINNESOTA 3 4 Court File No. 0:18-cv-01776-JRT-HB 5 6 IN RE: 7 PORK ANTITRUST LITIGATION 8 _____ / 9 ORAL VIDEOTAPED DEPOSITION 10 JENNIFER SULLIVAN 11 APRIL 15, 2022 12 13 ORAL VIDEOTAPED DEPOSITION OF JENNIFER SULLIVAN, via 14 Zoom, produced as a witness at the instance of the 15 Defendant Seaboard Foods, LLC and Seaboard Corporation, 16 and duly sworn, was taken in the above-styled and 17 numbered cause on the 15th day of April, 2022, from 18 10:32 a.m. to 2:05 p.m., before Melinda Barre, Certified 19 Shorthand Reporter in and for the State of Texas, 20 reported by computerized stenotype machine, all parties 21 appearing remotely via web videoconference, pursuant to 22 the rules of procedure and the provisions stated on the 23 record or attached hereto. 24 25			1 INDEX 2 3 PAGE 4 Examination by Mr. Ripa 4 5 Signature Page 110 6 Court Reporter's Certificate 112 7 EXHIBITS 8 EXHIBIT DESCRIPTION PAGE 9 10 Exhibit 1 Consumer Indirect Purchaser 27 11 Plaintiffs' Fourth Amended 12 Consolidated Class Action 13 Complaint 14 Exhibit 2 Consumer Indirect Purchaser 48 15 Plaintiffs' Objections and 16 Responses to Defendants' First 17 Set of Interrogatories 18 Exhibit 3 Grocery Receipts 65 19 20 21 22 23 24 25		
Page 2			Page 4		
1 APPEARANCES 2 (ALL APPEARED VIA ZOOM VIDEO CONFERENCE.) 3 4 FOR THE CONSUMER INDIRECT PURCHASER PLAINTIFFS 5 AND THE WITNESS: 6 Ms. Ling Wang 7 GUSTAFSON GLUEK PLLC 8 126 South 6th Street, Suite 2600 9 Minneapolis, Minnesota 55402 10 Telephone: 712.333.8844 11 E-mail: lwang@gustafsongluek.com 12 13 FOR SEABOARD FOODS LLC AND SEABOARD CORPORATION: 14 15 Mr. Jonathan Ripa 16 STINSON LLP 17 50 South Sixth Street, Suite 2600 18 Minneapolis, Minnesota 55402 19 Telephone: 612.335.1500 20 E-mail: jonathan.ripa@stinson.com 21 22 23 24 25 ALSO PRESENT: Jonathan Cruz, Videographer and Document Technician			1 THE VIDEOGRAPHER: We are on the record on 2 April 15th, 2022 at approximately 10:32 a.m. Central 3 time for the remote deposition of Jennifer Sullivan in 4 the matter of Pork Antitrust Litigation. My name is 5 Jonathan Cruz, and I am the videographer and document 6 tech on behalf of Lexitas. All appearances will be 7 noted on the stenographic record. Will the court 8 reporter please swear in the witness. 9 JENNIFER SULLIVAN, 10 having been first duly sworn, testified as follows: 11 EXAMINATION 12 QUESTIONS BY MR. RIPA: 13 Q. Ms. Sullivan, my name is John Ripa. I 14 represent Seaboard Foods, one of the defendants in this 15 case. 16 (Discussion off the record) 17 Q. (By Mr. Ripa) Good morning, Ms. Sullivan. I'm 18 John Ripa. I represent Seaboard Foods in this case. 19 Thanks for your time today. It's nice to meet you. 20 A. Nice to meet you. 21 Q. So before we get started today I just need to 22 go over a few formalities and ground rules. So can we 23 start just by having you state your full name for the 24 record, please. 25 A. Jennifer Lee Sullivan.		

<p style="text-align: right;">Page 57</p> <p>1 Smithfield for pork chops?</p> <p>2 A. Just the store brand. But I don't know. It</p> <p>3 would be Cub Foods but, you know, it doesn't -- it just</p> <p>4 says the Cub Foods sticker.</p> <p>5 Q. Okay. And how about for your boneless hams?</p> <p>6 MS. WANG: Same objection.</p> <p>7 A. Same with the ham. It would be Hormel or the</p> <p>8 store brand.</p> <p>9 Q. (By Mr. Ripa) What about bacon?</p> <p>10 MS. WANG: Object to form.</p> <p>11 A. The Hormel bacon.</p> <p>12 Q. (By Mr. Ripa) Okay.</p> <p>13 A. Then do you want the roasts?</p> <p>14 Q. Yes.</p> <p>15 A. Oh, the roasts, Smithfield, are the same. And</p> <p>16 then the deli sliced meat also, that's always different.</p> <p>17 Q. It's always different. So I think I heard you</p> <p>18 say -- I'm sorry. What?</p> <p>19 A. Oh, the Jimmy Dean's is the sausage links.</p> <p>20 Q. Oh, okay. So I don't see sausage links on</p> <p>21 column C here. But are you saying, so you bought</p> <p>22 sausage links as well? Should that be in column C as</p> <p>23 well?</p> <p>24 A. Correct.</p> <p>25 Q. Would that have been -- what frequency would</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. (By Mr. Ripa) Okay. But you bought hot dogs</p> <p>2 and sausage?</p> <p>3 A. Correct.</p> <p>4 Q. Looking to the -- still on row 79, just to the</p> <p>5 right of the column we were just looking at, columns H</p> <p>6 and I, do you see that they are empty for row 79?</p> <p>7 A. Yes.</p> <p>8 Q. And if you go all the way to the top of the</p> <p>9 document, I can represent to you that columns H and I</p> <p>10 are labeled Hog Producer and Hog Processor. But you can</p> <p>11 look at the top of appendix A if you want to check that</p> <p>12 for yourself.</p> <p>13 A. Okay.</p> <p>14 Q. Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know what a hog producer is?</p> <p>17 MS. WANG: Deposit.</p> <p>18 A. The farmer.</p> <p>19 Q. (By Mr. Ripa) Okay. I'm sorry?</p> <p>20 A. The farmer.</p> <p>21 Q. So do you know what a hog processor is?</p> <p>22 MS. WANG: Object to form.</p> <p>23 A. Who processes the meat.</p> <p>24 Q. (By Mr. Ripa) Do you know which hog producer</p> <p>25 produced the hogs that are used in the pork products you</p>
<p style="text-align: right;">Page 58</p> <p>1 you have bought those on during the class period?</p> <p>2 A. Oh, boy.</p> <p>3 MS. WANG: Object to form.</p> <p>4 A. Up until two years ago at least once a month,</p> <p>5 yes.</p> <p>6 Q. (By Mr. Ripa) What about the Schweigert label</p> <p>7 there in that column, what is that?</p> <p>8 A. That's lunch meat.</p> <p>9 Q. And what about Hillshire Farm?</p> <p>10 A. Hillshire Farm. Why am I having a brain fart</p> <p>11 on this? Hillshire fire, I don't know why I'm having a</p> <p>12 brain -- I'm spacing on this one.</p> <p>13 Q. Okay.</p> <p>14 A. And Oscar Meyer is hot dogs. That's also not</p> <p>15 on there. What these are are the receipts that I had.</p> <p>16 Q. These names here, the Hormel, Smithfield, Jimmy</p> <p>17 Dean's, those are --</p> <p>18 A. Yes.</p> <p>19 Q. So are there pork products that are named</p> <p>20 brands that you bought during the class period that</p> <p>21 would have been outside of what's named here</p> <p>22 potentially?</p> <p>23 MS. WANG: Object to form.</p> <p>24 A. These are the receipts that I had, but I didn't</p> <p>25 have hot dogs on here or sausage on here.</p>	<p style="text-align: right;">Page 60</p> <p>1 bought on this appendix?</p> <p>2 A. No.</p> <p>3 MS. WANG: Objection, calls -- sorry.</p> <p>4 Jen, if you'll just give a moment after his questions,</p> <p>5 give me an opportunity to object before answering.</p> <p>6 THE WITNESS: Okay. Sorry.</p> <p>7 MS. WANG: No worries.</p> <p>8 Q. (By Mr. Ripa) Do you know which hog processor</p> <p>9 processed the hogs that were used in the pork products</p> <p>10 you bought?</p> <p>11 MS. WANG: Object to form.</p> <p>12 A. No.</p> <p>13 Q. (By Mr. Ripa) So is it possible that a</p> <p>14 non-defendant hog producer produced the pork that you're</p> <p>15 claiming damages on in this case?</p> <p>16 MS. WANG: Object to form.</p> <p>17 Q. (By Mr. Ripa) Is that possible?</p> <p>18 MS. WANG: Object to form, calls for</p> <p>19 speculation.</p> <p>20 A. Possible, I guess. But I don't know honestly.</p> <p>21 Q. (By Mr. Ripa) Are the pork purchases listed in</p> <p>22 this row 79, are these the only purchases you're seeking</p> <p>23 damages on in this case?</p> <p>24 MS. WANG: Object to form.</p> <p>25 A. Besides the bacon and the sausage are the other</p>

<p style="text-align: right;">Page 61</p> <p>1 two that I have purchased.</p> <p>2 Q. (By Mr. Ripa) So bacon's listed here. Did you 3 mean hot dogs and sausage?</p> <p>4 A. Sorry. Yes, hot dogs and sausage.</p> <p>5 Q. Okay. So you're seeking damages in this case 6 on hot dogs and sausage as well, those purchases?</p> <p>7 MS. WANG: Object to form, misstates 8 testimony.</p> <p>9 Q. (By Mr. Ripa) Am I understanding that right?</p> <p>10 A. I'm sorry. I don't understand what you're 11 asking.</p> <p>12 Q. Yeah. No problem.</p> <p>13 So row 79 in appendix A that we're looking 14 at here, are you seeking damages in this case for any 15 pork purchases that are not represented on this row?</p> <p>16 MS. WANG: Object to form.</p> <p>17 A. Yes. I have purchased other items that are not 18 listed.</p> <p>19 Q. (By Mr. Ripa) Okay. Do you have receipts for 20 those items?</p> <p>21 A. I will look. Yes, I will look but not back 22 from 2008, if you need them.</p> <p>23 Q. Between January 2009 and the present, I just 24 want to ask about whether you made purchases of the 25 following types of pork products outside of the ones</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. (By Mr. Ripa) Okay. What about pork jowls, is 2 that something you've ever purchased?</p> <p>3 A. No.</p> <p>4 Q. What about pork ribs?</p> <p>5 A. Yes, but not on a monthly basis.</p> <p>6 Q. Okay. How often would you purchase pork ribs 7 during the class period?</p> <p>8 A. Probably -- in the whole class period probably 9 five times in all them years.</p> <p>10 Q. Okay. Do you have a recollection of where you 11 bought those pork ribs?</p> <p>12 MS. WANG: Object to form.</p> <p>13 A. Either Cub or Sam's.</p> <p>14 Q. (By Mr. Ripa) What about ground pork? Did you 15 make any ground pork purchases during the class period?</p> <p>16 MS. WANG: Objection, form.</p> <p>17 A. Sausages but not ground pork. Just plain 18 ground pork, no.</p> <p>19 Q. (By Mr. Ripa) Okay. Pepperoni?</p> <p>20 A. What was that?</p> <p>21 Q. Pepperoni?</p> <p>22 A. Have I purchased pepperoni?</p> <p>23 Q. Uh-huh.</p> <p>24 A. Yeah.</p> <p>25 Q. Okay. How often would you purchase pepperoni</p>
<p style="text-align: right;">Page 62</p> <p>1 that are listed on row 79 here.</p> <p>2 We've talked about hams. Did you buy any 3 pork loins?</p> <p>4 MS. WANG: Object to form.</p> <p>5 A. Loin, no, no, unless it's a roast.</p> <p>6 Q. (By Mr. Ripa) Did you buy any pork shoulders?</p> <p>7 MS. WANG: Object to form.</p> <p>8 A. Yes.</p> <p>9 Q. (By Mr. Ripa) Do you recall what brand of pork 10 shoulders you purchased?</p> <p>11 MS. WANG: Object to form.</p> <p>12 A. Cub Foods.</p> <p>13 Q. (By Mr. Ripa) How often did you buy pork 14 shoulders during the class period?</p> <p>15 A. Once a month.</p> <p>16 MS. WANG: Same objection.</p> <p>17 Q. (By Mr. Ripa) Do you have an understanding of 18 why pork shoulders are not listed on this appendix A if 19 you bought those once a month during the class period?</p> <p>20 A. They're roasts.</p> <p>21 Q. Okay. So you would include pork shoulder under 22 pork roasts?</p> <p>23 MS. WANG: Object to form.</p> <p>24 A. Yeah. That's what I had said at the beginning, 25 if the pork shoulder is a roast.</p>	<p style="text-align: right;">Page 64</p> <p>1 during the class period?</p> <p>2 A. Okay. We're really getting into this.</p> <p>3 MS. WANG: Object to form.</p> <p>4 A. Pepperoni. Pepperoni, a few times a year.</p> <p>5 Q. (By Mr. Ripa) And where would you purchase 6 that from?</p> <p>7 A. Cub Foods.</p> <p>8 MS. WANG: Object to form.</p> <p>9 THE WITNESS: Sorry.</p> <p>10 Q. (By Mr. Ripa) No worries. And how about 11 salami?</p> <p>12 A. Yes.</p> <p>13 Q. How often would you purchase salami?</p> <p>14 A. Along with the deli meats.</p> <p>15 Q. So once a month?</p> <p>16 A. No. The deli meats once a week.</p> <p>17 Q. Oh, excuse me. So you purchased salami once a 18 week?</p> <p>19 A. Yes, correct.</p> <p>20 Q. Okay. Where would you purchase that from?</p> <p>21 A. At Cub Foods.</p> <p>22 Q. Is there any other type of pork product that we 23 haven't just talked about that you purchased during the 24 class period?</p> <p>25 MS. WANG: Object to form.</p>